



1       2. The government has given and published notice of this action as  
2 required by law, including Supplemental Rule G for Admiralty or Maritime Claims  
3 and Asset Forfeiture Actions, Federal Rules of Civil Procedure, and the Local  
4 Rules of this Court. All potential claimants to the defendant An Interest in the  
5 Real Property Located at 5201 Bascule Avenue, Woodland Hills, California  
6 (“defendant property”) other than Claimant are deemed to have admitted the  
7 allegations of the Complaint. The allegations set out in the Complaint are  
8 sufficient to establish a basis for forfeiture.

9       3. The defendant property is titled in the name of David Danesh the  
10 Trustee of David Danesh Family Trust, established on March 10, 2016 (the  
11 “Trust”), has Assessor Parcel Number 2166-028-035, and is more particularly  
12 described as follows:

13           **THE FOLLOWING DESCRIBED REAL PROPERTY LOCATED**  
14           **IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA:**

15           **PARCEL B AS SHOWN ON PARCEL MAP L.A. NO. 8047 AS PER**  
16           **MAP FILED IN BOOK 34 PAGE 27 OF PARCEL MAPS, IN THE**  
17           **OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.**

18       4. The Trust shall retain possession of and title to the defendant  
19 property, except as provided herein.

20       5. Claimant shall pay the sum of \$300,000.00 to the government not  
21 later than 180 days following entry of this Consent Judgment. Such payment shall  
22 be made in the form of a cashier’s check made payable to the “United States  
23 Department of the Treasury”, and shall be delivered to Assistant United States  
24 Attorney Steven R. Welk, 312 N. Spring Street, 14th Floor, Los Angeles,  
25 California 90012. Said sum is hereby ordered forfeited to the United States of  
26 America and no other right, title or interest shall exist therein. The Internal  
27 Revenue Service (“IRS”) is ordered to dispose of the funds in accordance with law.  
28

1       6. No later than 90 days following the entry of this Consent Judgment,  
2 the parties shall appear telephonically before the Honorable Patrick J. Walsh to  
3 advise on the status of the payment to the government. If Claimant informs the  
4 Court that he is unable to make the requested payment within the time set in this  
5 Consent Judgment, Judge Walsh shall have the discretion to extend the deadline  
6 for payment.

7       7. In consideration of Claimant's payment of the above-described funds,  
8 the government shall to forego its attempts to seek forfeiture of the defendant  
9 property in connection with any conduct committed up to and including the date of  
10 the filing of this Judgment. The government agrees that if timely payment is  
11 arranged, it shall provide an executed Withdrawal of Lis Pendens for filing with  
12 the County Recorder of Los Angeles County.

13       8. Should Claimant fail to make the payment required herein within the  
14 time allowed, the following shall apply:

15           a. The government shall acquire a lien against the defendant real  
16 property in the sum of \$300,000.00. Said lien shall include a right of sale,  
17 allowing the government to take possession of and sell the defendant property  
18 beginning 10 days after the expiration of the 180-day deadline after the entry of  
19 Judgment, or any extended deadline set by Judge Walsh, unless the parties agree  
20 otherwise in writing.

21           b. Upon taking possession of the defendant property, the IRS shall  
22 sell the property following the same procedures that would apply if the property  
23 had been forfeited.

24           c. Upon taking possession of the defendant property pursuant to  
25 this paragraph, the IRS is authorized to remove any occupants and/or personal  
26 property remaining on the defendant property without further order of the Court.  
27 The IRS shall thereafter sell the property. The proceeds of sale shall be applied as  
28 follows, to the extent proceeds are available:

1                   i.         First, to all costs incurred by the IRS in taking possession  
2 of and selling the defendant property;

3                   ii.         Second, to the known lienholders: (1) U.S. Small  
4 Business Administration, as expressed in document number 94-1554091, filed on  
5 August 23, 1994; (2) James Yeramian, Clerk of the Governing Board, Mountains  
6 Recreation and Conservative Authority, as expressed in document number  
7 20131141559, filed on August 2, 2013; and (3) Mountains Recreation and  
8 Conservative Authority, as expressed in document number 20170055097, filed on  
9 January 13, 2017.

10                  iii.         Third, to the payment due under the terms of this Consent  
11 Judgment; and

12                  iv.         Fourth, any remainder to Claimant.

13                  9.         The Court finds that there was reasonable cause for the institution of  
14 this action. This consent judgment shall be construed as a certificate of reasonable  
15 cause pursuant to 28 U.S.C. § 2465.

16                  10.         Each of the parties shall bear its own fees and costs in this action.

17                  DATED: Sept 4, 2019



19                  THE HONORABLE STEPHEN V. WILSON  
20                  UNITED STATES DISTRICT JUDGE

21

22

23

24

25

26

27

28